National Bank v. *Comis.*, 72 N. H. 12, 55 Atl. 191, 101 Am. St. Rep. 650, that a creditor of a corporation had an insurable interest in the life of its manager. Such an interest could certainly be no greater than that of the corporation itself, and the language of the court would indicate that such was its view of the case, but the right of a corporation to carry such insurance was not before the court. In *Keckley* v. *Coushohockton Glass Co.*, 86 O. St. 213, 99 N. E. 299, Ann. Cas. 1913 D. 607 and note, the court says that a corporation can have an insurable interest in the life of a principal stockholder and promoter. But the question arise in a suit between two beneficiaries under the policies. The insurer did not deny liability and the case was decided upon the ground of estoppel. It is believed that the principal case is the first one to sustain such a policy in a suit against the insurer. On the other hand see *Security Mutual Ins. Co.* v. *Schott*, 30 Ohio Cir. Dec. 249, holding that a corporation has not an insurable interest in the life of a director, and *Tate* v. *Commercial Building Ass'n.*, 97 Va. 74, 33 S. E. 382, 45 L. R. A. 243, 75 Am. St. Rep. 770, that a building association has no insurable interest in the life of a stockholder who is not a debtor of the association. From these decisions and upon general principles it would seem that while an insurable interest will not arise from the mere relation of director or stockholder, yet a corporation by reason of peculiar circumstances may have such a pecuniary interest in the life of an officer or promoter as would ordinarily be insurable. Is there any reason why a corporation should not carry such insurance? This raises the second question as to whether such contracts are ultra vires of a corporation. The principal case holds that they are not and that such contracts are not contrary to public policy because of the corporate nature of the beneficiary. The contrary was held in *Victor* v. *Louise Cotton Mills*, 148 N. C. 107, 16 Ann. Cas. 295, 16 L. R. A. (N. S.) 1020. This was a suit by a stockholder to enjoin the corporation from carrying insurance on the life of its president. The president had resigned at the time the suit was brought, but the reasoning of the court is broad enough to cover the present case. For further cases on the subject see notes in 16 Ann. Cas. 295 and 16 L. R. A. (N. S.) 1020.

JUDGMENT—FOREIGN JUDGMENT IN PERSONAM ON CONSTRUCTIVE SERVICE.—Where the defendant, a Bavarian subject, was sued in New York on a judgment rendered against him in Bavaria on service by publication, *held* that the judgment would not be enforced here, it appearing that the defendant was domiciled and resident in New York and had filed notice of his intention of becoming a citizen of the United States at the time the said foreign judgment was rendered. *Grubel* v. *Nassauer*, (N. Y., 1913) 103 N. E. 1113.

Though the validity of personal judgments rendered on constructive service of process against non-residents is quite generally denied, when called in question in foreign jurisdictions, *Pennoyer* v. *Neff*, 95 U. S. 714, 24 L. Ed. 565; *Deering* v. *Bank of Charleston*, 5 Ga. 497, 48 Am. Dec. 300; see 12 MICH. L. REV. 312, and 16 L. R. A. 231; numerous cases have suggested obiter the right of a state to authorize personal judgments upon constructive

or substituted service against a citizen and resident absent from the state at the time, and the granting to such judgments full faith and credit in the forum. *Re Denick,* 92 Hun. (N. Y.) 161, 36 N. Y. S. 518; *Hamill* v. *Talbott,* 72 Mo. App. 22; *Henderson* v. *Staniford,* 105 Mass. 504, 7 Am. Rep. 551; *Huntley* v. *Baker,* 33 Hun. (N. Y.) 578; *Ouseley* v. *L. V. Trust & S. D. Co.,* 84 Fed. 602; *Schibsby* v. *Westenholz,* L. R. 6 Q. B. 155. These dicta rest on a recognition of allegiance as a sole and sufficient basis for the exercise of jurisdiction by a foreign tribunal. Though this view finds support in *Douglas* v. *Forest,* 4 Bing. 686, which appears to be the sole case exactly in point with the principal case, it has been repudiated in this country by several cases of unquestioned authority, and is impossible to reconcile with the reasoning of many others. *De la Montanya* v. *De la Montanya,* 112 Cal. 101, 44 Pac. 345, 32 L. R. A. 82, 53 Am. St. Rep. 165; *McEwan* v. *Zimmer,* 38 Mich. 765; *Smith* v. *Grady,* 68 Wis. 215, 31 N. W. 477; *Shepard* v. *Wright,* 59 How. Pr. (N. Y.) 512; *Amsbaugh* v. *Exchange Bank,* 33 Kans. 100, 5 Pac. 384; *Webster* v. *Reid,* 11 How. 437. In the last named case it is said "these suits were not a proceeding in rem against the land, but were in personam against the owners of it. Whether they all resided within the Territory or not does not appear, nor is it a matter of any importance. No person is required to answer in a suit on whom process has not been served, or whose property has not been attached. In this case there was no personal notice nor an attachment or other proceedings against the lands, until after the judgments. The judgments, therefore, are nullities, and did not authorize the executions on which the lands were sold." In the principal case the defendant was domiciled and resident in New York, and a contrary decision would have to be supported solely on the basis of allegiance, and would result in the paradox of determining an individual's civil rights by his political rather than by his civil status. The rights of prospective citizens, during the period of naturalization, might be seriously prejudiced, and the protection of our laws nullified. It is difficult to see how a contrary decision could be supported here, either on reason or authority, or even as a matter of policy.

JUDGMENT—NECESSITY OF STRICT COMPLIANCE WITH STATUTE IN CASE OF SERVICE BY PUBLICATION.—Where an affidavit for publication of summons was filed under a statute requiring, "stating the place of defendant's residence, if known to the affiant, and if not known, stating that fact," as a basis for substituted service, *held,* that filing an affidavit stating "that the last known post-office address of the defendant is unknown" is not a substantial compliance with the statute, and judgment rendered thereon is void. *Atwood* v. *Roan* (N. D. 1914) 145 N. W. 587.

The principal case reiterates the well established rule that there must be a strict compliance with statutes providing for service by publication, *Pennoyer* v. *Neff,* 95 U. S. 714, 24 L. Ed. 565; *Tunis* v. *Withrow,* 10 Ia. 305, 77 Am. Dec. 117; *Gilmore* v. *Lampman,* 86 Minn. 493, 90 N. W. 1113, 91 Am. St. Rep. 376; *Albers* v. *Kozeluh,* 68 Neb. 522, 94 N. W. 521, 97 N. W. 646; *Schoenfeld* v. *Bourne,* 159 Mich. 139; *Gibson* v. *Wagner,* (Colo. 1913) 136